

EXHIBIT H

From: Nelson Boxer <nboxer@pkbllp.com>
Sent: Monday, September 14, 2020 2:06 PM
To: Danielle J. Marlow
Subject: RE: Sep. 9, 2020 Subpoena to PNC Financial Services Group, Inc.

Dani,

My client is unwilling to devote further resources with respect to your client's Subpoena. PNC searched as previously instructed in our correspondence regarding the particular transaction dates referenced in the Subpoena. Any additional work, after PNC complied with the requests and the Subpoena, is unreasonable, unfairly burdensome and appears unnecessary.

Best,

Nelson

Nelson A. Boxer
Petrillo Klein & Boxer LLP
655 Third Avenue
22nd Floor
New York, New York 10017
nboxer@pkbllp.com
p 212.370.0338
c 917.273.2693

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From: Danielle J. Marlow <dmalow@moritthock.com>
Sent: Friday, September 11, 2020 10:02 AM
To: Nelson Boxer <nboxer@pkbllp.com>
Subject: RE: Sep. 9, 2020 Subpoena to PNC Financial Services Group, Inc.

Thanks Nelson – this is helpful and the format is perfect. If PNC would be willing to produce similar spreadsheets as of one week after the dates in question (April 14, 2014 and June 18, 2015), I think that would be sufficient and we could avoid motion practice. Let me know if that is agreeable, thanks.

From: Nelson Boxer [<mailto:nboxer@pkbllp.com>]
Sent: Thursday, September 10, 2020 8:18 PM
To: Danielle J. Marlow
Subject: Sep. 9, 2020 Subpoena to PNC Financial Services Group, Inc.

Dani,

In response to the above-referenced Subpoena issued in the action *In re Sears Holdings Corp., et al.*, U.S. Bankruptcy Court, S.D.N.Y., and pursuant to our previous correspondence concerning the scope of the

Subpoena, attached please find documents stamped PNC0001 through PNC0006. These documents are “Highly Confidential” pursuant to the parties’ December 7, 2018 Amended Stipulated Protective Order (Doc 1084) and are labelled as such. It is understood that your client reserves the right to contend that additional documents are due under the Subpoena and that my client reserves the right to interpose objections or defenses to production of any additional documents pursuant to the Subpoena.

Best,

Nelson

Nelson A. Boxer
Petrillo Klein & Boxer LLP
655 Third Avenue
22nd Floor
New York, New York 10017
nboxer@pkblp.com
p 212.370.0338
c 917.273.2693

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